

Sanitary Sewer Maintenance Plan

City of Imperial Beach

June 2008

Audit Report Update May 2010 (Chris Helmer)

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TABLE OF CONTENTS

INTRODUCTION	1
1.0 GOALS	2
2.0 ORGANIZATION	3
a) Authorized Representative.....	3
b) Contact Information	3
c) Chain of Communication.....	6
3.0 LEGAL AUTHORITY	9
4.0 OPERATION & MAINTENANCE	11
a) Collection System Map.....	11
b) Preventive Operation and Maintenance	12
c) Rehabilitation and Replacement Plan	12
d) Training.....	13
e) Contingency Equipment and Replacement Inventories	13
5.0 DESIGN & PERFORMANCE DESIGN STANDARDS.....	13
a) Standards for Installation, Rehabilitation and Repair	14
b) Standards for Inspection and Testing of New, Rehabilitated, and Repaired Facilities	14
6.0 OVERFLOW EMERGENCY RESPONSE PLAN	14
7.0 FATS OIL & GREASE CONTROL PROGRAM.....	14
8.0 SYSTEM EVALUATION & CAPACITY ASSURANCE PLAN	14
9.0 MONITORING MEASUREMENT & PROGRAM MODIFICATIONS	16
10.0 SSMP AUDITS.....	17
11.0 COMMUNICATIONS PROGRAM.....	17

INTRODUCTION

Following the State Water Resource Control Board's (SWRCB) adoption of the Statewide General Waste Discharge Requirement (GWDR) on May 2, 2006 (Appendix A), collection systems became the last major component of the wastewater management system to be regulated. Treatment plants, including pretreatment programs, have been regulated since the 1970s. The GWDR applies to all public collection system agencies in California that own or operate collection systems comprised of more than one mile of pipe or sewer lines, which convey untreated wastewater to a publicly owned treatment facility, and requires each agency to prepare a Sewer System Management Plan (SSMP).

This SSMP is a living document that will be updated and revised to reflect changes in practices, technology, and the collection system. It is designed to protect the public and the environment, to provide best management practices for the operation and maintenance of the collection system, and to conform to the Orders set forth by California's State Water Resources Control Board and the San Diego Region of California's Regional Water Quality Control Board. The following specific Orders have been addressed in this document:

-STATE WATER RESOURCES CONTROL BOARD ORDER NO. 2006-0003-DWQ
Statewide General Waste Discharge Requirements for Sanitary Sewer Systems

-CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, REGION 9, SAN DIEGO, ORDER NO. R9-2007-0005
Waste Discharge Requirements for Sewage Collection Agencies in the San Diego Region

-STATE OF CALIFORNIA STATE WATER RESOURCES CONTROL BOARD ORDER NO. WQ 2008-0002-EXEC
Adopting Amended Monitoring and Reporting Requirements for Statewide General Waste Discharge Requirements for Sewer Systems

This report is formatted to follow the order of the legislation with all of the section headings corresponding to the requirements of the GWDR.

1.0 GOALS

The City of Imperial Beach has developed a list of goals in accordance with the requirements of the GWDR. The City expects to meet these goals through the development and implementation of the SSMP.

1. Annually evaluate the funding needs to operate and maintain the sanitary sewer system using the most up-to-date *Sewer Utility Cost-of-Service Independent Rate Study*.
2. Implement the sewer system capital improvement program (CIP) projects as scheduled in the adopted 5-year CIP budget.
3. Annually review the priority of projects in the adopted 5-year CIP budget to address the most critical maintenance needs.
4. Annually evaluate the sewer system problem areas with an objective of designing maintenance and repair tasks that result in reduced jetting frequencies.
5. Maintain operation and maintenance records of the sanitary sewer system.
6. Update planned maintenance system checklists with each major equipment change.
7. Provide annual training on the elements of the SSMP and a minimum of 12 classroom hours per 24-month period for each sewer maintenance division employee.

2.0 ORGANIZATION

a) Authorized Representative

The Authorized Representative for the management of the City of Imperial Beach collection system is Mr. H.A. (Hank) Levien, Public Works Director.

b) Contact Information

Public Works Director

Hank Levien
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Sewer Division Supervisor

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Maintenance Worker I

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Imperial Beach, CA 91932

Maintenance Worker

Hector Martinis
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Maintenance Worker

Jose Aguirre
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Imperial Beach, CA 91932

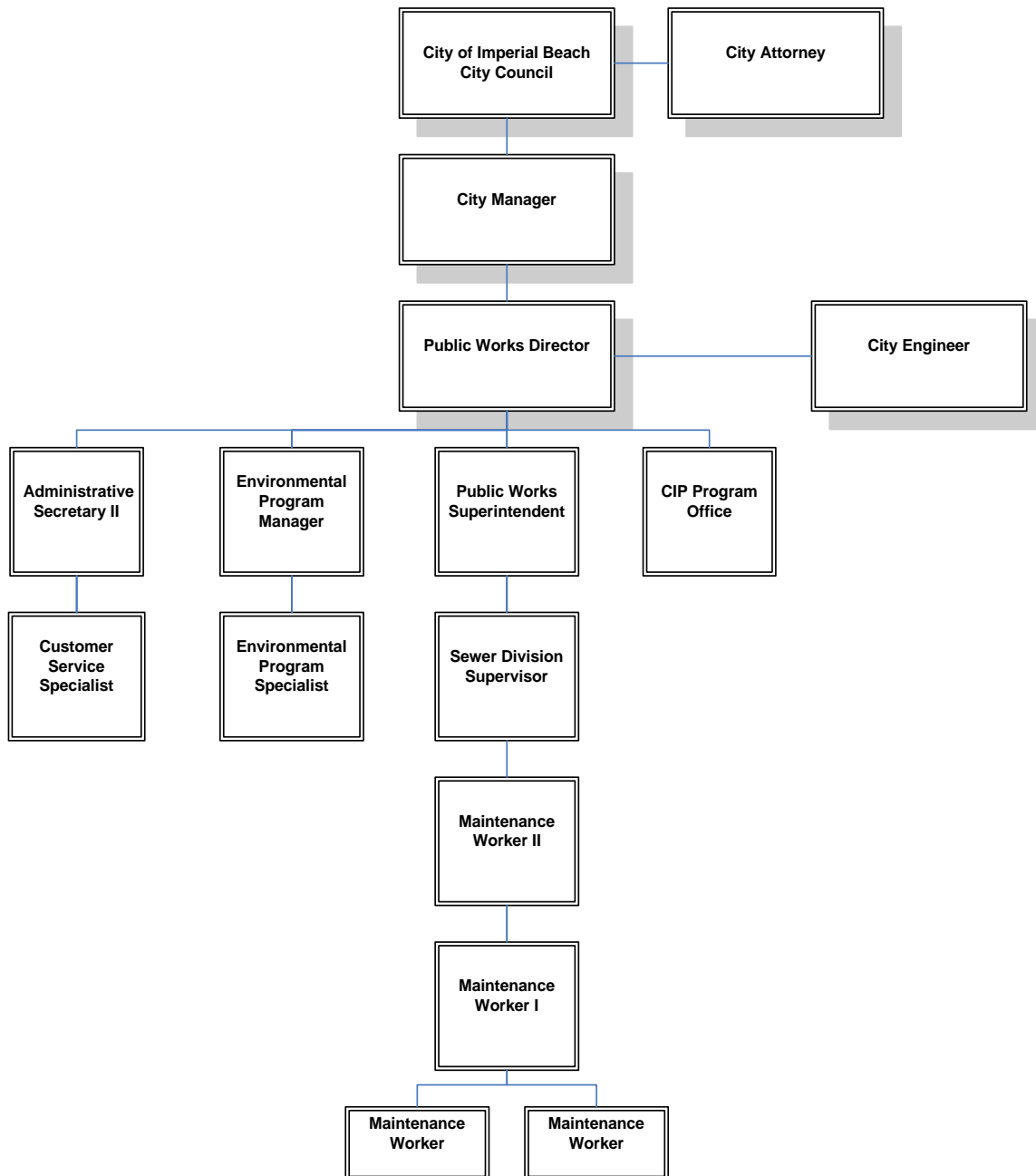
CIP Program Office

Vicki Madrid
495 10th Street
Imperial Beach, CA 91932

Customer Service Specialist

Sonia Galaviz
495 10th Street
Imperial Beach, CA 91932

City of Imperial Beach
Department of Public Works
ORGANIZATIONAL CHART



c) Chain of Communication

The following is the chain of communication within the City of Imperial Beach for reporting sanitary sewer overflows or other sewer events. The communication procedures vary between working and non-working hours.

Working Hours

During working hours all calls come into the Public Works Reception. Reception notifies the Sewer Division Supervisor. Based upon the data received from the initial call, the Sewer Division Supervisor then radios all sewer personnel to respond with the appropriate equipment and notifies the Public Works Director.

For any discharges of sewage to a drainage channel or a surface water: the Sewer Division Supervisor or designee will notify the State Office of Emergency Services (OES), the County Department of Environmental Health, and the San Diego Regional Water Quality Control Board. These notifications shall be as soon as possible, but not later than two hours after becoming aware of the discharge.

State Office of Emergency Services (OES)

General Reporting (800) 852-7550

County Department of Environmental Health

Ewan Moffit (858) 495-5579

Fax (858) 694-3670

Ewan.Moffit@sdcounty.ca.gov

San Diego Regional Water Quality Control Board (SDRWQCB)

Brian Kelley, Senior Water Resource Control Engineer, (858) 467-4254

bkelly@waterboards.ca.gov

Melissa Valdovinos (858) 467-2724

mvaldovinos@waterboards.ca.gov

(858) 571-6972 fax

After Hours: 858-822-8344

As soon as possible, the Sewer Division Supervisor notifies local agencies that may be affected by the discharge. The notification list includes the following agencies:

Lifeguards

Robert Stabenow, Captain, (619) 423-0208

Jason Lindquist, Lifeguard Sergeant, (619) 628-1420

Oscar Alvarez, Beach Lifeguard II, (619) 628-1424

Art Ayala, Beach Lifeguard II, (619) 628-1425

Tijuana Estuary

Tijuana River National Estuarine Research Reserve

Chris Peregrin, Acting Reserve Manager, (619) 575-3613 ext 303

Port of San Diego (for Pier SSOs)

Damon LaCasilla (619) 686-6534

Main Office / Environmental Services (619) 686-6254

24-Hour Harbor Police (619) 686-6272 (After Hours Reporting of SSOs)

County Department of Environmental Health

Proposition 65 Coordinator / Hazardous Materials Duty Specialist

(858) 495-5570

(858) 565-5255 after hours page

(858) 694-3670 fax

No later than 24 hours after a discharge of sewage to a drainage channel or a surface water, the Sewer Division Supervisor shall provide the Regional Water Quality Control Board with certification that OES and County Environmental Health have been notified by filling in the OES and county health agency information on the California Integrated Water Quality System (CIWQS) (<https://ciwqs.waterboards.ca.gov/>) and save the report as a draft. If the online system is not working, the Public Works Director shall email (RB9SSO@waterboards.ca.gov) or fax ((858) 571-6972) the information.

The Sewer Division Supervisor then completes the draft of the electronic reporting of the sewer spill into CIWQS. This CIWQS report will be reviewed and certified by the Public Works Director.

After Hours

After hours, the call will come into Sheriff Dispatch (619) 585-7232. Sheriff Dispatch has a schedule of Duty Personnel to call in the event of a sewer overflow/spill. The On-Call Duty Personnel are then responsible for determining the level of response, based on what is reported. The Duty Personnel contacts the required personnel to respond to the event, and the Sewer Division Supervisor/On-Call Duty Personnel. Further notifications proceed similar to events during working hours.

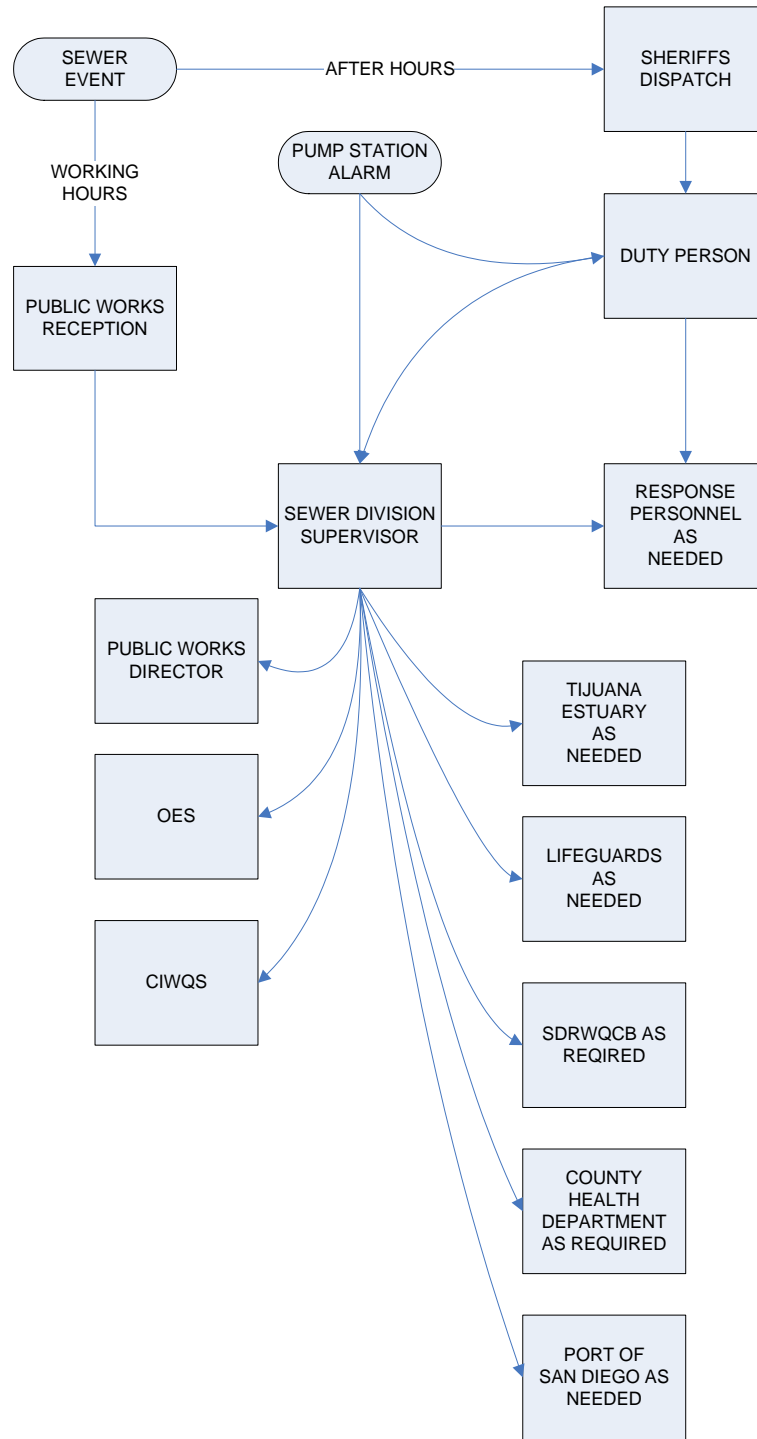
The Sewer Division Supervisor/On-Call Duty Personnel contacts management who then completes the draft of the electronic reporting of the sewer spill into the California Integrated Water Quality System (CIWQS). This CIWQS report will be reviewed and certified by the Public Works Director.

Complete Loss of Power

In the event of a complete loss of power, all sewer personnel shall report to the Public Works yard to perform assigned tasks and gather equipment.

The following chart illustrates the chain of communication for working hours and after-hours sewer events.

City of Imperial Beach
Department of Public Works
CHAIN OF COMMUNICATION



3.0 LEGAL AUTHORITY

Purpose: To provide authority for the City to administer it's collection system and to provide measures to enforce codes and regulations.

The Elements of the City's Legal Authority:	
http://qcode.us/codes/imperialbeach/ http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:sandiegoco_ca_mc	
Does City have legal authority to operate a wastewater collection system?	<i>Yes. See California Government Code § 38900 – 38902, Resolution No. 2009-6731, 2008-6683, and 2008-1077.</i>
Does City have a sewer use ordinance that describes how the public can use its system?	<i>Yes. See Municipal Code §13.04 et al.</i>
Does City require, through legally binding requirements, that new sewer systems are properly designed and constructed?	<i>Yes. See Resolution No. 2012-7152</i>
Do City design standards require vehicular access to all manholes and cleanouts?	<i>Yes. Resolution 2008-1077 and Municipal Code §13.04.180.B and 13.04.190</i>
Does City have a section in its sewer use ordinance that prohibits discharge of FOG and other debris into the sewer?	<i>Yes. See Municipal Code §13.04.030.B. and 13.040.E.</i>
Does City have regulations prohibiting downspout, roof drain, and area drain connections to the sanitary sewer?	<i>Yes. Resolution No. 2008-1077 Municipal Code §13.04.30.A.</i>
Does the existing building code provide for jurisdiction over construction of privately-owned sewer lines, including laterals?	<i>Yes. See Municipal Code §13.04.040.</i>
Does the City have authority to regulate the use of grease haulers?	<i>No.</i>
Does City system have a satellite collection system attached to it and if so, does City have a service agreement with the overseeing agency?	<i>No. City does not have a satellite system attached to it.</i>
Does City require that a public sewer easement be recorded over any new publicly owned sewer that is not within a public right of way?	<i>Yes. Resolution No. 2008-1077 Municipal Code §13.04.180.</i>

Does the City possess the right of entry to the sewer or any property upon which there is a structure housing the sewer, and also the right to transfer the right of entry to outside parties?	Yes. Resolution No. 2008-1077 Municipal Code §13.04.190.A.
Does City require private laterals to be inspected when a property is sold?	Yes. Resolution No. 2008-1077 Municipal Code §13.04.070.C.
What are the means by which the City may sanction users if they fail to comply with regulations and/or cause deliberate or significant violations resulting in negative impacts to environmental and/or human health?	Disconnection: see Municipal Code §13.04.120. Civil and/or criminal recourse: see Municipal Code §13.04.170.
Does City possess valid legislative means of raising revenues to fund all activities described herein, also including future Capital Improvement Projects?	Yes. See Municipal Code §13.06 et al.

Recommendations: *All recommendations implemented.*

Under the General Waste Discharge Requirements (Order 2006-0003), legal authority over the City's sewerage system must be in place by May 2, 2009. It is recommended that the City enact legislation in accordance with the following:

- ~~1. Adopt legislation requiring that new manhole and cleanout structures be constructed within an access easement that will provide vehicular access for emergency response and maintenance. As some manholes are within the confines of a protected estuary, this restriction cannot be universally applied. City should adopt regulations which grandfather in existing manholes and provides for vehicular access to manholes constructed hereafter.~~
- ~~2. Strengthen Municipal Code §13.04.030.B, legislation prohibiting discharge of fats, oil, and debris into the sewer system. Refer to County Code §68.162 for enhanced wording.~~
- ~~3. Adopt legislation prohibiting private stormwater connections to the sewerage system. Refer to County Code §68.306, .307, and .332.~~
- ~~4. Adopt legislation giving the City authority to regulate grease haulers similar in intent to the San Diego Municipal Code §64.07 et al, which provides for oversight of food service establishments.~~
- ~~5. Adopt legislation requiring that an access easement be provided for all public sewers constructed that are not within a public right of way, and that any retirement of public right of way is reviewed to ensure that easements for utilities are preserved.~~
- ~~6. Adopt legislation that provides right of entry for City crews to the sewer or any property~~

~~upon which there is a structure housing the sewer, and also the right to transfer the right of entry to outside parties.~~

- ~~7. Adopt legislation requiring that, in the event that a property is sold or undergoes a major remodeling, a licensed plumbing contractor inspect all sewer laterals for the property from the sewer main to the cleanout and if there is no cleanout to construct one. The legislation should then require remediation of deficiencies prior to the sale or permitting of the remodel.~~
8. Strengthen legislation under which the City may sanction users if they fail to comply with regulations and/or cause deliberate or significant violations resulting in negative impacts to environmental and/or human health. The existing recourses should be strengthened so that they reflect the intent and structure as laid out in San Diego Municipal Code §64.0301.

Updates: As new technology becomes available and as the sewer system is modified, the legal authority that governs the sewer system must be updated to accommodate these changes. The Legal Authority should be reviewed semiannually and as issues arise to determine any modifications that need to be incorporated.

4.0 OPERATION & MAINTENANCE

a) Collection System Map

Purpose: To maintain up-to-date maps of the wastewater collection system facilities, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater pumping and piping facilities.

A map book of the system is contained in Appendix B with the most up-to-date information maintained on the City GIS database.

Initial Mapping: The initial Geographic Information System (GIS) mapping was developed from land survey data to the center of each sewer manhole, performed in June 2007. The survey was performed utilizing Global Positioning System (GPS) equipment accurate to within one-tenth of a foot (0.1 feet). Vertical Datum: National Geodetic Vertical Datum of 1929 (NGVD 29). Horizontal Datum: North American Datum of 1983 (NAD 83) – California State Plane Coordinate System, Zone 6.

The attribute data for the pipelines and manholes was generated from the original system map and subsequently field verified as the pipes and manholes have been inspected. The depth of each accessible manhole was measured to provide the invert elevations.

In May 2011 the City created a GIS Manager position to maintain and enhance the City's GIS database. Keeping the sewer collection system maps up to date is an ongoing effort that is assigned to the GIS Manager.

Updates: Field crews and contractors are directed to inform the GIS specialist if there are

discrepancies between the GIS and field verified conditions. Additionally, if there are modifications to the system through the Capital Improvement Program or through private development, the GIS specialist is provided with the Record Drawings for the project. The GIS specialist is responsible for performing updates to the GIS data

b) Preventive Operation and Maintenance

Purpose: To describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas.

See Appendix C for Operation and Maintenance (O&M) Schedule.

Updates: The Sewer Division Supervisor shall review the O&M Schedule and scope regularly. After any mechanical failure, the Sewer Division Supervisor shall review the O&M Schedule to determine if additional work items or an increased frequency might have alleviated the failure. At a minimum, the Sewer Division Supervisor shall review and revise the O&M Schedule in its entirety annually.

Recommendations:

It is recommended that the current CCTV inspections of the sewer system be completed and the system be assessed for structural and maintenance needs. It is further recommended that they system be televised in its entirety once every 5 years, coincident with the re-certification of the SSMP.

A review of cleaning cycles should be performed after any public sewer spill and upon completion of the sewer televising.

c) Rehabilitation and Replacement Plan

Purpose: To develop a rehabilitation and replacement plan that identifies and prioritizes system deficiencies and to implement short-term and long-term rehabilitation actions to address each deficiency.

Methodology: A survey of the physical condition of the system was conducted through internal Closed Circuit Television (CCTV) inspections of selected sewer mains. For the purposes of determining appropriate funding and capital improvement budgets, a statistical sample of pipelines was inspected. CCTV inspections were performed on 273 pipelines out of the 942 in the system, which equates to about 70,000 feet of inspections or one third of the system. The pipes were chosen from every sewer basin in footage quantities of diameter and pipe material to represent the entire basin. This level of inspection provides an industry standard 95% confidence level that the sample is an accurate representation of the system with a 5% margin of error.

Civil engineers registered in California reviewed the CCTV inspections and developed a condition assessment for the inspected pipelines. Recommended remediation for discovered deficiencies were developed and prioritized along with an estimated construction cost for the recommended work. The remediation recommendations were checked against the hydraulic

model of the sewer system to ensure that recommended repairs would provide sufficient capacity for current and future development. From the 273 inspected pipes there are 21 that are in need of repair.

Updates: The ongoing program should include regular visual and CCTV inspections of manholes and sewer pipes. It is recommended that they system be televised at a rate that will provide a complete inspection of the system every four to five years. The CCTV inspections are required to locate the structural and maintenance issues predicted through the statistical sampling.

d) Training

Purpose: To provide training on a regular basis for Sanitary Sewer System Operations and Maintenance staff; maintain training records, and require hired contractors to be appropriately trained. Subject matter experts, such as experienced staff, equipment manufacturer representatives, or other industry professionals, shall perform all training. Refresher courses shall be provided periodically to maintain and enhance technical knowledge, skills, and safety. No employee shall undertake work for which they have not been trained and are competent to complete in a safe manner.

See Appendix E for the Training Program.

Updates: The Sewer Division Supervisor and the Public Works Director should annually evaluate the training program to ensure that changes in the sewer system, changes in equipment and technology, are properly addressed.

e) Contingency Equipment and Replacement Inventories

Purpose: To provide equipment and replacement part inventories, including identification of critical replacement parts.

The list of recommended replacement parts to have in stock was developed from discussions with pump manufacturers, parts suppliers, and a review of the operations and maintenance manuals for each of the pumps currently in use by the City.

See Appendix F for Contingency Equipment and Replacement Part Inventories.

Updates: As maintenance work is performed, this list shall be updated to include additional parts that should be kept in stock. The list should be revised and expanded as equipment is changed or modified.

Recommendations: It is recommended that a full inventory be completed for the Public Works Yard and that the parts inventory is kept in the City's Asset Management Software (AMS). Future part orders should be logged into the AMS to track costs, suppliers, frequency of part orders and current inventory.

5.0 DESIGN & PERFORMANCE DESIGN STANDARDS

a) Standards for Installation, Rehabilitation and Repair

Purpose: To identify design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems.

The City of Imperial Beach has adopted by Resolution No. 2012-7152, the 2012 ~~2007-6471~~, the 2006 Edition of *The Standard Specifications for Public Works Construction (Greenbook)*, The 2006 2012 Regional Supplements to The Greenbook 2012 ~~2006~~, and the 2012 ~~2006~~ Edition of the San Diego Area Regional Standard Drawings. See Appendix G for a copy of the resolution

b) Standards for Inspection and Testing of New, Rehabilitated, and Repaired Facilities

Purpose: To identify the procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

The City of Imperial Beach has adopted by Resolution No. 2012-7152, the 2012 ~~2007-6471~~, the 2006 Edition of *The Standard Specifications for Public Works Construction (Greenbook)*, and The 2006 Regional Supplements to The Greenbook 2012 ~~2006~~. See Appendix G for a copy of the resolution.

For each construction contract it will be determined if the construction inspections will be performed by a contracted Construction Management Consultant, by the Design Consultant, or by City Staff.

Updates: The current resolution should be updated to reflect the most current version of the publications.

6.0 OVERFLOW EMERGENCY RESPONSE PLAN

Purpose: To provide an overflow emergency response plan that identifies measures to protect public health and the environment.

See Appendix H for Overflow Emergency Response Plan.

7.0 FATS OIL & GREASE CONTROL PROGRAM

Purpose: To reduce the amount of Fats, Oils, and Grease entering the sewer system through source Control.

See Appendix I for FOG Program Procedures.

8.0 SYSTEM EVALUATION & CAPACITY ASSURANCE PLAN

Purpose: To prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event.

In addition to the CCTV inspections, a hydraulic model of the system was developed using the MWH Soft H2Omap Sewer software. The model was built using the GPS locations and rim elevations from the manhole survey performed for the system mapping GIS work, and manhole rim to flow line measurements (to calculate the invert elevations for the pipes). An average of the slopes for the surrounding pipes was used to estimate the invert elevations of dead-end and not found manholes.

To calculate the sewer loading, dwelling units and population units were assigned to every parcel in the City of Imperial Beach based on the zoning. Each population unit was assigned 80 gallons a day of sewer flow (in accordance with the Sewer Design Guide). The flow from each parcel was then attributed to the upstream manhole of the connecting sewer main. The model was then calibrated using the flow data from the three ADS flow meters that track the flow from Imperial Beach into to the City of San Diego system. In January 2008, eight additional flow meters were installed at locations throughout Imperial Beach. The data from these monitors was used to further calibrate the model as well as to create diurnal curves for residential, commercial, and mixed-use areas. Each basin was given the diurnal curve that best represented the area. The model results are the current flows or current system capacity.

The model was used to create two additional scenarios:

1. Current wet weather flows showing the effects of a 10-year six hour storm on the system.
2. Future flows that show how population growth and planned projects will affect the system.

The additional loads for the wet weather flows were derived from rain events captured by the eight flow monitors. For the wet weather scenario the flows from the storm on January 23 – 24th 2008 were used due to the length and intensity most closely resembling a 10-year storm with a six-hour duration. The flows recorded by monitors that were not affected by pump station flows were compared to the average flows on similar dry weather days. The difference in flow was 27,000 gallons of inflow and infiltration. There are 80,266 feet of pipe upstream from the flow monitors used for this study. The quantity of inflow and infiltration per foot of pipe per inch of rain per hour was then calculated. According to the SANGIS Isopluvial map a 10-year storm with a six-hour duration would provide 1.6 inches of rain to Imperial Beach. The inflow and infiltration per foot was extrapolated to equal the affects of 1.6 inches of rain. Each pipe was given additional flow based on the length of the pipe. A storm curve was created to simulate the effects of a six-hour storm. The model was then programmed for the storm to take place from 5 AM to 11 AM so as to include the peak flows for the day.

The current population of Imperial Beach is approximately 27,700. The General Plan of 1994 estimates the population at full build out will be 30,750. In accordance with the discussions with the City's Planning Department, for the future flows scenario additional flows were added for the Seacoast Inn (currently planned hotel), and a second similar hotel / condo complex on Seacoast Drive. A mixed use, 208-unit condo over commercial was simulated for Palm Avenue between 7th and 9th Street. In addition, a population increase of 500 was added to the Palm Avenue Corridor. An additional 300 population units were added to both the south Seacoast Drive, and to

the R-3000-D zone north of Calla Avenue, and an additional 858 population units were spread out in the R-3000 and C-3 zones. This additional population would bring the City up to the estimated build-out population.

The Current Flow scenario shows that all pipes with a diameter greater than 18" have a ratio of depth of flow-to-pipe diameter (d/D) less than 0.75, which conforms to the City of San Diego Sewer Design Guide (2004). There are 29 pipes less than 18" in diameter that have a (d/D) ratio above the 0.5 maximum called for in the Sewer Design Guide. See the map in Appendix J.

The wet weather flow scenario shows that all pipes with a diameter greater than 18" have a (d/D) less than 0.75, which conforms to the City of San Diego Sewer Design Guide (2004). There are 33 pipes less than 18" in diameter that have a (d/D) above the 0.5 maximum called for in the Sewer Design Guide. See the map in Appendix J.

The future flow scenario shows that all pipes with a diameter greater than 18" have a (d/D) less than 0.75, which conforms to the City of San Diego Sewer Design Guide (2004). There are 33 pipes less than 18" in diameter that have a (d/D) above the 0.5 maximum called for in the Sewer Design Guide. See the map in Appendix J.

The structural and maintenance findings from the CCTV inspection were integrated with hydraulic assessment data to develop recommendations on rehabilitation or replacement of lines. All of the recommended repairs have been prioritized for inclusion into a 15-year capital improvement program. The recommended repairs are detailed in Appendix J.

In addition to the CCTV evaluation and the hydraulic model, the wet wells of the pump stations were evaluated to determine if they possess sufficient capacity utilizing the criteria detailed in the Sewer Design Guide. Five of the City's eleven pump stations were found to have wet wells that do not provide sufficient volume to provide five minutes of pumping time at low flow conditions. This data correlates with the hydraulic model data showing that the system is backing up before several of these pump stations. The results of the wet well sizing analysis are available in Appendix J.

Recommendations: It is recommended that the wet wells indicated in Appendix J as needing increased capacity be expanded. This work should be scheduled in conjunction with replacing the pipes that have been identified as having insufficient capacity in order to provide for future flows. The impact of any future development should be evaluated to determine specific impact on capacity to determine the triggering of the capacity related projects. The model should be updated as demographics, development and re-development affect the City's flow profiles.

9.0 MONITORING MEASUREMENT & PROGRAM MODIFICATIONS

Purpose: To track the effectiveness of the SSMP through the following:



-
1. Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
 2. Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;
 3. Assess the success of the preventative maintenance program;
 4. Update program elements, as appropriate, based on monitoring or performance evaluations; and
 5. Identify and illustrate SSO trends, including: frequency, location, and volume

Each of the elements of the SSMP has methodology for updating the processes and maintaining records. In general, as a living document, the elements of the SSMP shall be modified as needed to represent the lessons learned through implementation.

10.0 SSMP AUDITS

Purpose: To provide a methodology for the required semiannual audit of the SSMP program.

Every even year (semiannually), the Public Works Director shall oversee an audit of the SSMP program that will culminate in a report documenting the effectiveness of the program in reducing sewer spills, maintaining the level of service of the sewer system, and providing sewer capacity for development. The report shall identify areas where actual operations differ from the documented procedures and provide recommendations for updating either the operations or documented procedures. The report shall identify deficiencies in the SSMP and provide steps to correct them. This report shall be kept on file.

11.0 COMMUNICATIONS PROGRAM

Purpose: To provide the public the opportunity to provide input to the SSMP as the program is developed and implemented.

The SSMP process will be discussed and open for public input at the City Council meetings. In addition, the SSMP will be posted on the City's website along with contact information where interested parties can comment on the plan and the implementation.